

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

B.P., et al.,

## Plaintiffs,

V.

**No: 2:23-cv-00071-TRM-JEM**

## **CITY OF JOHNSON CITY, TENNESSEE, et al.,**

## Defendants.

**PLAINTIFFS' POSITION STATEMENT REGARDING MAY 2 HEARING EXHIBITS**

Per the Court's Dkt. 198 Order, Plaintiffs submit the following position statement regarding the sealing of the Exhibits submitted to the Court by Counsel for Defendant Peters at the May 2 Hearing.

- Exhibit 1 – This exhibit should remain sealed because it reveals the full names of plaintiffs and class members that are confidential under the Protective Order.
- Exhibit 2 – This exhibit can be unsealed.
- Exhibit 3 – This exhibit was produced by the Defendant City and was marked by Defendant City as confidential under the Protective Order. Plaintiffs’ position is that the City’s confidential designation is appropriate, and the exhibit should remain sealed. Plaintiffs further state that because it reveals the name of Female 12, as well as the names and photographs of other victims of Sean Williams, which are confidential under the Protective Order, this exhibit should remain sealed.
- Exhibit 4 – This exhibit can be unsealed.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on May 28, 2024 to counsel of record:

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